

# EXHIBIT 4

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

*Plaintiff,*

v.

21-cv-05350-PKC-JAM

RICHARD XIA, a/k/a YI XIA, and FLEET NEW  
YORK METROPOLITAN REGIONAL CENTER,  
LLC, f/k/a FEDERAL NEW YORK  
METROPOLITAN REGIONAL CENTER, LLC,

*Defendants,*

JULIA YUE, a/k/a JIQING YUE;  
XI VERFENSTEIN, and XINMING YU,

*Relief Defendants.*

**[PROPOSED] DISCOVERY ORDER**

THIS MATTER came before the Court on March 26 2025, on the Letter Motion (the “Motion”) of the Court-appointed Fund Distribution Administrator (the “Distribution Administrator”) for entry of an order directing that Defendants Richard Xia (“Xia”) and Fleet New York Metropolitan Regional Center LLC (“Fleet”; collectively the “Defendants”) produce a complete EB-5 Investor contact list and/or other documents sufficient to show the mailing address, email address, phone number, WeChat account number and immigration counsel contact information for each EB-5 Investor identified on **Exhibit 1** to the Motion (the “Missing Contact Investors”). Having considered the Motion and being duly advised, the Court finds the same should be **GRANTED**.

**IT IS ORDERED** that the Defendants Xia and Fleet produce a complete contact list and/or documents sufficient to show for each Missing Contact Investor, the investor’s mailing address,

email address, phone number, WeChat account number and contact information for his/her immigration counsel by April 4, 2025.

**SO ORDERED** this \_\_\_\_\_ day of March 2025

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Hon. Pamela K. Chen  
United States District Judge